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May 14, 2025

**VIA ECF**

Hon. Anthony J. Brindisi  
U.S. District Court Judge  
United States District Court  
Northern District of New York  
Alexander Pirnie Federal Bldg. and U.S. Courthouse  
10 Broad Street  
Utica, NY 13501

Hon. Miroslav Lovric  
U.S. Magistrate Judge  
Northern District of New York  
Federal Building and U.S. Courthouse  
15 Henry Street  
Binghamton, NY 13901

Re: *Kweller et al. v. The County of Broome, et. al.*  
3:25-cv-00343-AJB-ML

Dear Judge Brindisi:

This firm represents Defendants City of Binghamton, Police Chief Joseph T. Zikuski, Captain Cory Minor and Detective Amanda Miller (the “City of Binghamton Defendants”) in the above-referenced matter. I am writing to request leave of the Court to file a memorandum of law in support of the City of Binghamton Defendants’ motion to dismiss in excess of the twenty-five-page limit set forth in this Court’s local rules. The City of Binghamton Defendants respectfully request ten additional pages given the number of claims involved in this case.

Although, to date, no such request has been made in this case, we respectfully note that this Court granted requests to file oversized briefs in two related cases with substantially similar claims

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against the same defendants (*see Rindgen v. Broome County, et al.*, 3:24-cv-01325-AJB-ML, ECF Dkt. Nos. 42, 73; *Kweller v. The County of Broome, et al.*, 3:24-cv-01328-AJB-ML, ECF Dkt. No. 35).

Thank you for your time and attention to this matter.

Respectfully submitted,

*s/Christina F. Vitolo*

Christina F. Vitolo

cc: All Counsel of Record (via ECF)